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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of	**)**	
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Schools And Libraries Universal Service	**)**	CC Docket No. 02-6
Support Mechanism	**)**	

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COMMENTS OF THE NATIONAL HISPANIC MEDIA COALITION

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The National Hispanic Media Coalition ("NHMC") respectfully submits these comments in response to the Federal Communication Commission's ("FCC" or "Commission") Public Notice seeking feedback on the revised Eligible Services List ("ESL") for funding year 2012.[1] NHMC is a strong supporter of the E-Rate program, however, it is disappointed that the Commission has not taken this opportunity to make the costs associated with after school computer lab staffing and end-user training eligible for E-Rate funding. As NHMC explained in an earlier filing, outreach to a number of educators has shown that lack of training on certain technologies provided, in part, by E-Rate funds has proven to be a significant barrier to ensuring that students fully receive all the benefits of access to the Internet.[2] The simple changes to the ESL proposed here would ensure that the money invested in schools and libraries through the E-Rate program can be used in a more meaningful way, rather than simply providing technology and access that goes underused and unappreciated by the students and teachers that it is meant to aid.

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[1] *Wireline Competition Bureau Seeks Comment on Draft Eligible Services List for Schools and Libraries Universal Service Program*, CC Dkt. No. 02-6, Public Notice (Wireline Comp. Bur. 2011), *available at* http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0624/DA-11-1096A1.pdf ("2012 ESL Public Notice").

[2] Comment of National Hispanic Media Coalition (NHMC), CC Dkt. No. 02-6; GN Dkt. No. 09-51 (filed July 9, 2011), *available at* http://www.nhmc.org/sites/default/files/NHMC%20E-Rate%20Comment.pdf ("NHMC Comment").

E-rate funding has made broadband access a reality for many students across the nation, and the recently announced Learning On-The-Go wireless pilot programs will go a long way towards expanding this access.[3] However, even though E-Rate has connected many students to the Internet that wouldn't have otherwise had access, in many low-income districts, opportunities to use the equipment and services is severely restricted due to a lack of computers and limited time spent in the computer lab. This places a significant strain on students who lack home Internet access. Not only do these students lack the opportunity to learn basic Internet skills, but they fall behind as homework assignments and supplemental learning materials continue to shift into cyberspace. Even considering the many successes of the E-Rate program, NHMC continues to believe that a few, slight eligibility modifications would make a world of difference for students who rely on school or library Internet access for their educational attainment. The proposed ESL continues to bar E-rate funds from being used to pay labor costs for school and library personnel and "end-user training, such as training of teachers and staff in the use of covered services in their programs of instruction or for professional development."[4]

It is NHMC's position that the suggested changes will allow E-Rate funded schools to get the most out of the benefits received. First, NHMC believes that the labor costs associated with staffing computer labs after school hours are essential because, without staff on hand, schools' computer labs cannot function during the time in which students, and the community, would receive the greatest benefit from their use. Second, NHMC knows that training of teachers who

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[3] *E-rate Deployed Ubiquitously (EDU) 2011 Pilot Program*, WC Dkt. No. 10-222, Order, DA 11-1181 (rel. July 11, 2011), *available at* http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0711/DA-11-1181A1.pdf ("2011 Learning On-The-Go Order").
[4] *See Schools and Libraries Universal Service Support Mechanism, Draft Eligible Service List for Funding Year 2012*, *available at* http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0624/DA-11-1096A2.pdf ("2012 Proposed ESL for Funding ").

will use the technologies provided for by E-Rate funds is imperative and will ensure that teachers and students are able to make the most out of the extraordinary power that new technology can bring to the classroom.

The Commission should place labor costs for after school personnel on the ESL. NHMC believes that funding for staffing outside of school hours is very important, given the limited amount of time allowed for computer usage during school hours. In its past comment in this proceeding, NHMC shared anecdotal evidence with the Commission that was obtained through a series of interviews with educators.[5] These interviews yielded a great deal of information. For example, it was reported that many students have little access to broadband during and after school hours even though broadband access is funded through E-rate.[6] Classrooms generally have one or two computers, one for the teacher, and the other to be shared by a class full of students.[7] And the computer lab, which usually accommodates around thirty students, is not available for students to use after school hours.[8]

NHMC revives its past recommendation that students should have broadband access for at least two hours after the school day is complete, so that they can complete online homework and access supplemental learning materials regardless of whether or not they have Internet access or a PC at home. This will enable teachers to bring classrooms into the digital age with digital textbooks and other technology-based or technology-dependent curriculum. As NHMC has noted in the past, placing labor costs for two hours of after school access on the ESL is

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[5] NHMC Comment at 3-5.
[6] *Id.* at 7.
[7] *Id.*
[8] *Id.*; NHMC applauds the Commission for its past decision to allow E-rate funded computer labs and libraries to stay open for community use, *Schools and Libraries Universal Service Support Mechanism, Order and Notice of Proposed Rulemaking*, 25 FCC Rcd. 1740 (2010), however, merely allowing access is not enough. If the labs and libraries are not staffed they cannot remain open to facilitate educational opportunities for students.

consistent with past FCC decisions, including its decision to allow schools that receive E-rate

funding to permit members of the general public to use schools' Internet access during non-

school hours.[9] The Commission found that waiver of its current rule was in the public interest

because otherwise "services and facilities purchased by schools using E-rate funding remain

largely unused during evenings, weekends, school holidays, and summer breaks."[10] Similarly,

funding two hours of after school computer lab staff so that students may further their education

online, is in the public interest because it utilizes existing broadband infrastructure to serve

students that may otherwise have no opportunity to learn online after school hours.

The Commission should also place end-user training and professional development for

teachers and staff on the ESL. NHMC's interviews also yielded information about teachers'

comfort level with certain technology.[11] NHMC found that students who visit the computer lab

during teacher-drafted time slots are limited by the technical expertise of their teachers.[12]

Because teachers do not receive any professional development on technology, students are

unable to take full advantage of computer lab hours, which are already very limited.[13] Time

spent in a computer lab should allow students who may be unfamiliar with the technology to

actively engage with trained staff so that they will become digitally literate citizens who can

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[9] *Schools and Libraries Universal Service Support Mechanism, Order and Notice of Proposed Rulemaking*, 25 FCC Rcd. 1740, 1744 (2010).
[10] *Id.* at 1748.
[11] NHMC Comment at 3-5. For example, after speaking to a teacher that NHMC identified as Ms. Garcia (name concealed for privacy purposes), NHMC learned that Ms. Garcia's school has a "state of the art" computer lab, and that due to separate funding Smart Boards are going into every classroom. However, she noted that because teachers receive no technology training, many have no idea how to use the computer lab or the Smart Boards. She is having difficulty figuring out the Smart Boards, and many of the teachers, in her opinion, are "far less tech savvy" than her. She does not believe that her weekly trips to the computer lab yield as fruitful of results as some other teachers', because she does not have the skills and training to help take her students to the next level. *Id.*
[12] *Id.*
[13] *Id.* at 4.

carry the skills they develop with them long after graduation and share their expertise with their immediate families, who may not yet recognize the value in broadband adoption. NHMC fears that, without trained staff on hand to adequately assist a digitally illiterate student, the computer on the desk becomes nothing more than a box of wires and the Internet connection becomes a road to nowhere, leaving the millions of dollars invested in its provision as meaningless to that student as the equipment that it provides. Adding training costs to the ESL will ensure that, during the limited amount of time that students spend in the computer lab each week, their teachers will be able to facilitate meaningful online learning.

NHMC urges the Commission to consider its recommendations and change the ESL to include labor costs associated with after school computer center staffing and technology training for teachers in the list of eligible services.

Respectfully Submitted,

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